

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, *et al.*

Debtors.¹

The Official Committee of Unsecured Creditors of the Commonwealth of Puerto Rico,

as agent of

The Financial Oversight and Management Board For Puerto Rico

as representative of

The Commonwealth of Puerto Rico,

Plaintiff,

-v-

Bettina Whyte,

as agent of

The Financial Oversight and Management Board For Puerto Rico

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Adv. Proc. No. 17-257 (LTS)

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747).

as representative of

The Puerto Rico Sales Tax Financing
Corporation,

Defendant.

**MUTUAL FUND GROUP AND PUERTO RICO FUNDS' MOTION
TO CERTIFY QUESTIONS OF LAW TO THE SUPREME COURT OF PUERTO RICO**

Permitted intervenors, certain mutual funds managed by OppenheimerFunds, Inc. and the First Puerto Rico Family of Funds (the “**Mutual Fund Group**”), and certain Puerto Rico-based mutual funds (the “**Puerto Rico Funds**”²), as holders of senior and subordinated bonds (the “**COFINA Bonds**”) issued by the Puerto Rico Sales Tax Financing Corporation (“**COFINA**”), hereby move to certify the novel questions of Puerto Rico law at the heart of this proceeding to the Puerto Rico Supreme Court (the “**Motion to Certify**”), pursuant to Rule 25 of that Court.

The Mutual Fund Group and the Puerto Rico Funds seek to certify the questions presented in the *Motion of the COFINA Agent to Certify Questions Under Puerto Rico Law to the Supreme Court of Puerto Rico* Dkt. No. 329 (the “**COFINA Agent Motion**”). In support of its Motion to Certify, the Mutual Fund Group and Puerto Rico Funds adopt and incorporate by reference the arguments asserted by the COFINA Agent in the COFINA Agent Motion.

² The Puerto Rico Funds are the following Puerto Rico-based funds: Puerto Rico AAA Portfolio Bond Fund II, Inc.; Puerto Rico AAA Portfolio Bond Fund, Inc.; Puerto Rico AAA Portfolio Target Maturity Fund, Inc.; Puerto Rico Fixed Income Fund, Inc.; Puerto Rico Fixed Income Fund II, Inc.; Puerto Rico Fixed Income Fund III, Inc.; Puerto Rico Fixed Income Fund IV, Inc.; Puerto Rico Fixed Income Fund V, Inc.; Puerto Rico Fixed Income Fund VI, Inc.; Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc.; Puerto Rico Investors Bond Fund I; Puerto Rico Investors Tax-Free Fund, Inc.; Puerto Rico Investors Tax-Free Fund, Inc. II; Puerto Rico Investors Tax-Free Fund III, Inc.; Puerto Rico Investors Tax-Free Fund IV, Inc.; Puerto Rico Investors Tax-Free Fund V, Inc.; Puerto Rico Investors Tax-Free Fund VI, Inc.; Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc.; Tax-Free Puerto Rico Fund, Inc.; Tax-Free Puerto Rico Fund II, Inc.; Tax-Free Puerto Rico Target Maturity Fund, Inc.; and UBS IRA Select Growth & Income Puerto Rico Fund.

I hereby certify that, on this same date, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

RESPECTFULLY SUBMITTED,
In San Juan, Puerto Rico, today February 26, 2018.

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